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April 17, 2003

**E-FILED ONLY**

The Honorable Andre M. Davis  
United States District Judge  
United States District Court  
For the District of Maryland  
101 West Lombard Street  
Chambers 5B  
Baltimore, Maryland 21201

Re: Russian Research Center, Kurchatov  
Institute v. Western Services Corporation  
 Civil No.: AMD 02-3878

Dear Judge Davis

This letter constitutes the parties' joint report regarding ADR, deposition hours, and proceedings before a United States Magistrate Judge as required by your recently entered Scheduling Order.

The parties do not believe that an early settlement/ADR conference is indicated. The parties have also declined to unanimously consent to proceed before a United States Magistrate Judge.

With respect to deposition hours, the parties have spent some time anticipating and analyzing the needs of this case, particularly in view of its subject matter and the fact that so many of the potential witnesses are not native speakers of English, or speakers of English at all. It is clear even at this stage that interpreter services will be required for a majority of the depositions which, of course greatly prolongs the process.

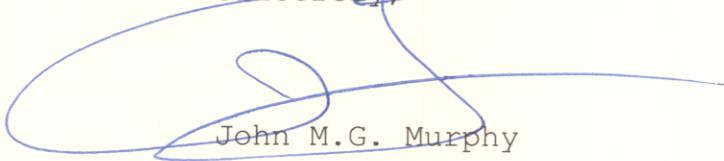
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Given these considerations, the parties have agreed that Plaintiff Kurchatov Institute should be allotted 80 hours of deposition time; that Defendants Western Services Corporation and Guia Utmelidze should be allotted 120 hours of deposition time; and that third party Defendant GSE Systems, Inc. should be allotted 80 hours of deposition time. The parties respectfully note that their agreement and recommendation as to deposition time is made without prejudice to the rights of any party to request further deposition time and/or relief from the witness number and day and hour restrictions set forth in Fed. R. Civ. P. 30(a) (2) (A) and 30(d) (2) .

Thank you for your kind consideration of these matters.

Sincerely,



John M.G. Murphy

JMGM/mck

cc: Charles L. Simmons, Jr., Esquire  
Margaret A. Keeley, Esquire  
Jesse B. Hammock, Esquire